

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

PAOLA GUEVARA, Minor, by her parents and)
next friends, MARIA GUADALUPE SALDANA,)
and VALENTIN GUEVARA,)
GUADALUPE SALDANA, Individually, and)
VALENTIN GUEVARA, Individually,)

Plaintiffs,)

v.)

UNITED STATES OF AMERICA,)

Defendant.)

CASE NO: 14-CV-151

AFFIDAVIT

I, Matthew Williams, being first duly sworn upon oath, hereby state that I have personal knowledge of the matters set forth herein:

1. I am of legal age and competent to testify to the matters contained within this Affidavit.

2. I am the lead attorney retained by Maria Guadalupe Saldana, and Valentin Guevara, Individually and as the natural parents and next friend of their daughter, Paola Guevara, in connection with the care provided to the Plaintiffs at Mount Sinai Hospital in September of 2011, and am familiar with the facts surrounding this litigation.

3. This lawsuit involves a medical negligence claim related to the failure to timely diagnose and treat infection at Mount Sinai Hospital.

4. A settlement in the amount of \$45,000.00 for Mount Sinai has been agreed to by the Plaintiffs and the Defendant, Mount Sinai Hospital.



5. I have been a practicing attorney for approximately 17 years and specialize in medical negligence cases. It is my professional opinion that this settlement with Mount Sinai Hospital is fair, reasonable, and in good faith.

6. This settlement with the hospital is a partial settlement, and the lawsuit will continue against the United States of America.

Further Affiant Sayeth Not.



Matthew L. Williams

SUBSCRIBED and SWORN to before me
this 13th day of May, 2015.



Notary Public